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Attorney for Carlos F. del Carmen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA)	Case No. CR-08-00328 RMW
)	
Plaintiff,)	STIPULATION AND []
)	ORDER GRANTING TEMPORARY
vs.)	RELEASE OF DEFENDANTS'
)	PASSPORTS DURING FOREIGN
PAULA LUNA ALVAREZ, aka)	DEPOSITIONS
PAULA LUNA, aka PAULA)	
JUAREZ, and CARLOS F.)	
CONTRERAS, aka CARLOS F.)	
DEL CARMEN)	
)	
Defendant.)	
)	

1 Defendant Paula Luna Alvarez, through her counsel of record, Alex C. Park,
2 defendant Carlos F. del Carmen through his counsel of record, George G.
3 Benetatos, and the United States of America, by approval and through its counsel
4 of record, United States Attorney Richard C. Cheng, hereby submit this stipulation
5 and proposed order requesting the release of the passports of Paula Luna Alvarez
6 and Carlos F. del Carmen for temporary discovery purposes.

7 WHEREAS, on July 13, 2010 this court ordered that defendants be allowed
8 to take the foreign depositions of a number of witnesses in Mexico prior to the date
9 of trial in this case.

10 WHEREAS, defendants have determined it necessary for the
11 accomplishment of a complete defense that Paula Luna Alvarez and Carlos F. del
12 Carmen attend the depositions of said witnesses.

13 WHEREAS, the passports of Paula Luna Alvarez and Carlos F. del Carmen
14 have been surrendered to the Clerk of the U.S. District Court pursuant the pretrial
15 release orders.

16 WHEREAS, for good cause, counsel for defendants Paula Luna Alvarez and
17 Carlos F. del Carmen request that their passports be temporarily released to allow
18 both defendants to attend the foreign depositions in this case.

19 WHEREAS, Plaintiff United States of America, through counsel of record,
20 United States Attorney, Richard C. Cheng, hereby agree to this stipulation and
21 proposed order.

22 NOW THEREFORE, the undersigned parties, by and through their counsel
23 of record respectfully stipulate as follows:

- 24 1. The passports of Paula L. Alvarez and Carlos F. del Carmen will be
25 released by the Clerk of the United States District Court to the temporary
26 possession of defendants Paula L. Alvarez and Carlos F. del Carmen;
- 27 2. Upon return to the United States following the foreign depositions in this
28 case the passports of Paula L. Alvarez and Carlos F. del Carmen will be

1 immediately surrendered to the Clerk of the United States District Court.
2

3 Respectfully submitted,

4 LAW OFFICES OF ALEX C. PARK

5 Dated: August 8, 2010

6 By: /s/ Alex C. Park

7 Alex C. Park,
8 Attorney for Paula L. Alvarez

9 LAW OFFICES OF GEORGE G. BENETATOS

10 Dated: August 8, 2010

11 By: /s/ George G. Benetatos

12 George G. Benetatos,
13 Attorney for and Carlos F. del Carmen

14 THOMAS M. O'CONNELL
15 UNITED STATES ATTORNEY

16 Dated: August 8, 2010

17 By: /s/ Richard C. Cheng

18 Richard C. Cheng, U.S. Attorney
19 Attorney for Plaintiff

20 **ORDER**

21 For good cause shown above,

22 IT IS SO ORDERED.

23
24 Dated: 8/16/10

25 
26 HONORABLE RONALD M. WHYTE
27 United States District Judge
28